

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S SECOND SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS BRATTA (PR/USPS-T-5: 5-6)

(February 23, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for
Docket No. N2012-1

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PR/USPS-T-5-5

Please refer to USPS-LR-N2012-1/40 - Materials Responsive to PR USPS-T5-1(a), worksheet LR40.xls.

- a. Please define the acronyms used in this worksheet (such as CS, INT SQ FT, etc.), list the sources for data appearing in this worksheet, and provide a description of the data provided in this library reference.
- b. Please confirm that the file shows five different types of multi-purpose P&DCs that will remain after network realignment: District/ CS, Retail, BMEU, OIG/IS, and Carrier Unit.
- b. Please explain the multiple functions performed at each of these 5 types of multi-purpose P&DCs.
- c. Please confirm that the file estimates that 2.8 percent of the square footage of P&DCs are multi-purpose facilities.
- d. Your response to PR/USPS-T-5-1(a), which asks you to explain how you determined that only 95 percent of Labor Distribution Codes 37 and 38 and non-personnel costs will be realized as savings, states that this worksheet contains the answer, yet it appears that 2.8 percent of remaining square P&DC footage is devoted to multi-purpose facilities. Please reconcile how the 2.8 percent figure demonstrates that 95 percent of Labor Distribution Codes 37 and 38 and non-personnel costs will be realized as savings?

PR/USPS-T-5-6

Please refer to USPS-LR-N2012-1/31. In the preface you state: "eMARS_WHEP_Staffing Changes Final_AM_v5: This document contains the base and proposed staffing numbers for all eMARS Sites (Gaining, Study, and Other)."

- a. Please confirm that field 'Gaining_Site_Name' lists names of the sites that would gain staff as a result of network rationalization initiative. If not confirmed, please explain what sites are listed under this field.
- b. Please indicate the names/numbers of the fields where 'study' and 'other' sites are listed.
- c. Please provide the definition/descriptions of sites called 'study' and 'others'
- d. Please, list all sources of data provided in eMARS_WHEP_Staffing Changes Final_AM_v5